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James L. Capel, Jr (1933-1991)

August 7, 2001

**BY E-MAIL AND U.S. MAIL**

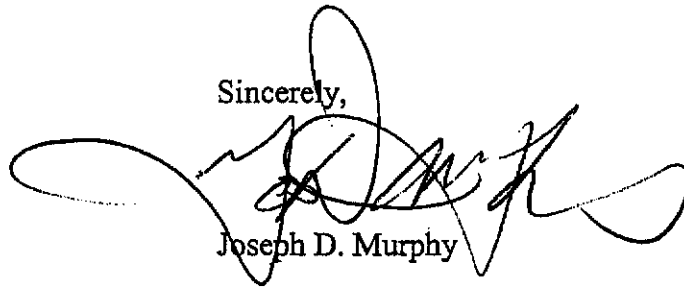
Scott McCullough, Esq.  
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Re: *Essex Telcom, Inc. v. Gallatin River Communications LLC*,  
Docket No. 01-0427 (Illinois Commerce Commission)

Dear Mr. McCullough:

I have enclosed Gallatin River Communications' Responses to Essex Telcom, Inc.'s  
Data Request Nos. 1-15.

Sincerely,



Joseph D. Murphy

JDM:baf  
Enclosure

cc: Michael Skrivan - w/enclosures

OFFICIAL FILE

ILL. C. C. NO. 01-0427  
*Essex* 6

Witness  
Date 10/31/01 Reporter *ad*

ESSEX EXHIBIT NO. 6

**GALLATIN RIVER COMMUNICATIONS  
RESPONSE TO ESSEX TELCOM  
DATA REQUEST NO. 3 DATED JULY 9, 2001**

**Responsible Witness: Michael Skrivan**

**3. Please provide a description of the method by which (including any dedicated circuits and/or switching facilities used) Gallatin provides retail FX service.**

Response to Data Request No. 3:

FX service has what is commonly referred to as an "open end" and a "closed end." The closed end is where the customer's phone is physically located and the open end is in the exchange where the customer wants to have local calling. When an end user orders FX service with the "open end" in a Gallatin serving area (so that calls originating in Gallatin's exchange are routed as "local" calls to the customer), the customer orders a dedicated facility, such as a private line facility, from the customer's home exchange to the Gallatin exchange in which the end user wants "local" calling. This open end is connected to the line side of the Gallatin switch and a telephone number is assigned to the end user.

**GALLATIN RIVER COMMUNICATIONS  
RESPONSE TO ESSEX TELCOM  
DATA REQUEST NO. 5 DATED JULY 9, 2001**

**Responsible Witness: Michael Skrivan**

**5. Paragraph 8 of Gallatin's Answer to Essex' Amended Complaint states that**  
~~"Gallatin avers that it is entitled to compensation for transport for calls that~~  
**originate and terminate within the same local calling area where Gallatin is**  
**required to transport the traffic outside of that local calling area for interconnection**  
**with Essex Telcom."**

- A. Please describe with specificity, including but not limited to each and every rate element and rate level, the type of compensation that Gallatin claims to be entitled to in the circumstances described in the quote immediately above.**

**Response to Data Request No. 5A:**

In the situation where a CLEC orders a single Point of Interface (POI) in a LATA, and requests Gallatin to provide transport to exchanges not in the local calling area of the POI, Gallatin would be entitled to receive a tandem switching charge, as specified in Attachment 1 in the Interconnection Agreement, of \$.002147 per minute of use. Gallatin would also be entitled to receive Common Interoffice Transport, as specified in Attachment 1 of the Interconnection Agreement at \$.002765 per minute of use.

- B. Please indicate whether the compensation Gallatin claims to be entitled to in the circumstances described immediately above will be rated from a tariff, the UNE prices in the current interconnection agreement or some other source. If some other source applies, please describe that source and provide a copy of the source document.**

**Response to Data Request No. 5B:**

The compensation Gallatin is entitled to under the circumstances described above is based on local interconnection provisions of the Interconnection Agreement between

the Parties. Calls within the local calling area are subject to the Interconnection Agreement.

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**GALLATIN RIVER COMMUNICATIONS  
RESPONSE TO ESSEX TELCOM  
DATA REQUEST NO. 6 DATED JULY 9, 2001**

**Responsible Witness: Michael Skrivan**

**6. In numerous places in Gallatin's Answer to Essex' Amended Complaint, Gallatin asserts that access charges are appropriate when the calling party and called party are not both physically located in the same local calling area. See, e.g., ¶¶ 8, 14, 15, 16, 30, 31 and *seriatim*.**

- A. Does Gallatin take the position that Gallatin's access tariff applies and controls the relationship between Gallatin and Essex with regard to traffic between Gallatin users and Essex users when the calling party and called party are not both physically in the same local calling area?**

**Response to Data Request No. 6A:**

**Yes.**

- B. If Gallatin takes the position that the access tariff applies and controls, please state whether the intrastate access tariff or the interstate access tariff applies.**

**Response to Data Request No. 6B:**

If the calling party location and the called party location are in the same state, the intrastate access tariff applies. If the calling party location and the called party location are in different states, the interstate access tariff applies.

- C. If Gallatin takes the position that the access tariff applies and controls, please state whether the access service being provided is Feature Group ("FG") A, B, C or D, or is FX. [FX as used in this question could be provided to end users or carriers, contrary to the limitation in Definition (7).]**

**Response to Data Request No. 6C:**

The access service could be provided under either Feature Group A or D, depending on how it is ordered and installed. It is technically feasible to provide either

presubscribed intraLATA or interLATA interexchange carrier. If a Gallatin customer places a call to an Essex Telcom customer whose NXX is associated with the Gallatin customer's local exchange (an exchange to which the originating customer does have local calling) but where Gallatin is aware that the called party number terminates to a location that is physically located in a non-local exchange, then Gallatin will treat Essex Telcom as the interexchange carrier and bill Essex Telcom originating access. In this situation, Essex Telcom is providing the interexchange service through an arrangement that works like an 800 call. Just as in the case of 800 traffic, the interexchange service provider is considered the access customer and is responsible to pay for access charges. In that case, Essex Telcom would be the access customer.

**GALLATIN RIVER COMMUNICATIONS  
RESPONSE TO ESSEX TELCOM  
DATA REQUEST NO. 13 DATED JULY 9, 2001**

**Responsible Witness: Michael Skrivan**

**13. Does Gallatin utilize any host/remote arrangements as described in § 6.1.3(D) and (E) of its Illinois intrastate access tariff? If the answer is yes, please provide a list of each remote and its host. For each host/remote arrangement please also state whether the host and remote are in the same local calling area.**

Response to Data Request No. 13:

**Yes.**

<b>Host</b>	<b>Remotes in Same Local Calling Area</b>	<b>Remote(s) in Different Local Calling Area</b>
Dixon	Nelson, Grand Detour, Harmon.	Savanna, Mt. Carroll, Thomson
Galesburg	Wataga, Cameron, Knoxville	Avon
Pekin	North Pekin, South Pekin, Talbot	Manito, Forest City, Green Valley, Havana, Topeka, Lacon

**GALLATIN RIVER COMMUNICATIONS  
RESPONSE TO ESSEX TELCOM  
DATA REQUEST NO. 14 DATED JULY 9, 2001**

**Responsible Witness: Michael Skrivan**

**14. Please provide the physical location (including street address) of the modems or other equipment that "answer" the call when a local customer in Savanna dials 273-7057.**

**Response to Data Request No. 14:**

207 W. Second Street, Dixon IL (Dixon Central Office).



**GALLATIN RIVER COMMUNICATIONS  
RESPONSE TO ESSEX TELCOM  
DATA REQUEST NO. 15 DATED JULY 9, 2001**

**Responsible Witness: Michael Skrivan**

**15. Please provide the physical location (including street address) of the modems or other equipment that "answer" the call when a local customer in Dixon dials 284-5000 or 284-5009.**

**Response to Data Request No. 15:**

**207 W. Second Street, Dixon IL (Dixon Central Office).**